## To the Commissioner of the FDA

I write to you to urge you to require two things in regards to genetically engineered foods:

- 1. Labeling of Genetically Engineered Foods or a moratorium on the sale of GE
- 2. Safety testing for Genetically Engineered Foods

At this point in time there is inadequate and biased information about the effects of GE foods on those that eat them. Currently, as you know, the concept of substantial equivalence is used to assure us that GE foods are safe. Through researching this concept and its application, I have come to the realization that substantial equivalence is grossly inadequate for such assurance. The tests to demonstrate substantial equivalence focus on specific components of the GE food that is in question, and compare them to some known characteristics of its non-gentically engineered counterpart. Based on those known few comparisons, a GE food can be declared "substantially equivalent" to its non-GE counterpart. Such tests fail to address in any manner the unanticipated side-effects of genetic engineering. For example, the tryptophan made by Showa Denko K.K. in 1989 was shown to be "substantially equivalent" in the usual way, and yet it contained less than 0.01% of a highly toxic substance resulting from genetic engineering. Consumption of this toxin resulted in the illness of thousands of consumers, and the death of 37. Substantial equivalence failed to assure safety.

Until adequate testing of GE foods is in place, there are two safe choices that the FDA can choose between. Either there should be a moratorium of GE foods until such measures of testing are in place, or foods should be labeled, so that the consumer can choose whether to risk eating such foods or not.

Any testing done should be done by independent scientific entities, since there is much evidence pointing to the biased results coming out from the biotech industries and those that they fund. (An article that demonstrates this bias is "The New Thought Police Suppressing Dissent in Science" by Mae-Wan Ho and Jonathan Mathews, The Institute of Science in Society, No 7/8 February 2001, or explore Arpad Pusztai's home page on the web http://www.freenetpages.co.uk/hp/a.pusztai)

Sincerely,

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FDA Commissioner

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Food and Drug Administration

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